



SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
(202) 736 8000
(202) 736 8711 FAX

tvawazer@sidley.com
(202) 736-8119

BEIJING	GENEVA	SAN FRANCISCO
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FOUNDED 1866

July 5, 2006

Via Electronic Filing (ECFS)

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E.
Suite 110
Washington, D.C. 20002

Re: Facility ID No. 77480
KTUZ-TV-DT, Shawnee Oklahoma
Request for Waiver of Interference Protection Deadline
and Renewal of DTV STA
MB Docket No. 03-15

Dear Ms. Dortch:

Oklahoma Land Company LLC ("Oklahoma Land"), licensee of KTUZ-TV-DT, Shawnee, Oklahoma, hereby requests a waiver of the July 1, 2006 interference protection deadline. As set forth below, Oklahoma Land has been unable to build-out KTUZ's authorized DTV facilities due to serious technical and tower problems it encountered since becoming licensee in September 2004 that were unforeseeable and/or beyond its control. For these reasons, Oklahoma Land also requests a renewal of its reduced-power DTV STA so it can continue to provide DTV service while it works to finalize a permanent solution to KTUZ's technical problems. See FCC File No. BEDSTA-20060601APZ.

Oklahoma Land LLC became the licensee of KTUZ-TV on September 30, 2004. See FCC File No. BALCT-20040525AJT. Since becoming involved with the station, Oklahoma Land has encountered a myriad of problems, including:

(i) KTUZ's transmission plant has been severely neglected for some time. The problems at the station's transmitter site included leaks in transmission lines, an improperly wired and bypassed voltage regulator, tower light alarm failures, coolant leaks, extensive corrosion in the band pass filter caused by previous coolant leaks, missing tower bolts, missing transmission line hangars and improperly supported transmission line sections and a number of other problems.

(ii) KTUZ operates on a tower in Norman, Oklahoma that cannot support a new, combined NTSC/DTV antenna. KTUZ-TV's current tower was constructed in a flood plane and the guy anchors are not stable enough to hold a new antenna, regardless of size.

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To strengthen the existing tower, 8 enormous, new caissons would need to be poured to replace the tower's 8 existing guy anchor piers. In all, this strengthening work would require, *inter alia*, the removal of an estimated 790 tons of soil from the site.

(iii) the City of Norman's planning division has indicated that Oklahoma Land will not be allowed to construct a new tower or undertake significant tower strengthening work at KTUZ's current site. The tower was originally approved as a one-time compromise. Because the tower was constructed in a flood plane, the City will oppose any proposal that disturbs the topography at the site. For this reason, any request by Oklahoma Land's to strengthen the existing tower by removing approximately 790 tons of soil to pour 8 new caissons would be DOA.

(iv) the station was constructed at variance from its analog license. Although KTUZ had an analog license to operate at 5 MW, the facility actually constructed included a different antenna and was never capable of running at that power level. The analog antenna actually installed was subsequently split in half with the bottom half used for a very low-power DTV STA facility apparently to meet KTUZ's initial DTV build-out obligation. Several remedial analog filings have been submitted to the FCC since Oklahoma Land became involved with the station in an attempt to have KTUZ's authorizations reflect its actual operating parameters. KTUZ's analog station is currently operating pursuant to a reduced-power STA because it cannot attain the power levels authorized in its analog license (FCC File No. BLCT-20001108ABD) or construction permit (FCC File No. BPCT-20040729AOV).

(v) the reduced-power DTV STA inherited by Oklahoma Land when it became licensee of KTUZ (FCC File No. BDSTA-20021113AAT) did not provide the requisite signal strength to Shawnee, KTUZ's City of License. Oklahoma Land subsequently filed for and received a modified DTV STA that doubled the ERP to ensure that Shawnee received the requisite 48 dBu signal (FCC File No. BMDSTA-20050309ADX).

Given this seemingly endless series of problems, Oklahoma Land's primary focus has been to keep KTUZ's analog and digital facilities on the air. While Oklahoma Land's engineers have worked wonders to accomplish this goal, the changes/fixes they have used are only stop-gap measures. Accordingly, Oklahoma Land is also pursuing a long-term solution to these problems. It recently proposed to relocate KTUZ's transmission facilities to a new tower to be constructed by Richland Tower at the Oklahoma City antenna farm. This request is still pending before the Media Bureau.

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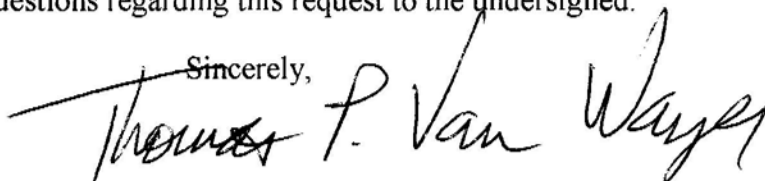
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For all these reasons, Oklahoma Land submits that its request for a waiver of the interference protection deadline should be granted because the technical and tower problems it encountered were unforeseeable and/or clearly beyond its control. For these same reasons, Oklahoma Land requests a renewal of its low-power DTV STA so that it can continue to provide DTV service while it works to finalize a long term solution.

Please direct any questions regarding this request to the undersigned.

Sincerely,

A handwritten signature in black ink, reading "Thomas P. Van Wazer". The signature is written in a cursive style with a large, sweeping "T" and a long, trailing "Wazer".

Thomas P. Van Wazer